



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation
D&D Wreck Rebuilders, LLC**

1413 Howard Street
St. Louis, Missouri 63106
FRS# N/A

Inspection Date(s)
January 26, 2022

SIGNATURE
Scott Postma, Inspector, ECAD, Air Branch

Authorized for Release by

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1. Safety Data Sheets, 29 pages.
2. Confidentiality Notice, 1 page
3. Receipt for Documents and Samples, 1 page
4. Subpart HHHHHH Checklist, 16 pages
5. Photographs and Photograph Log, 15 pages
6. Filter Specifications, Filter Replacement Log, Gauge Directions, Paint Usage Record, Bill Meyer, John Larson, and Bill James Training certifications, Initial Notification, Paint Gun Specifications, Paint Booth Records, and Electronic Mail, 39 pages
7. Repaired Gauges pictures, 3 pages.

INSPECTION OBJECTIVE

Due to an odor complaint and EPA's national compliance initiative for Creating Cleaner Air for Communities focused on hazardous air pollutants (HAPs), a full compliance evaluation was conducted to determine compliance at D&D Wreck Rebuilders, LLC (hereinafter referred to as D&D or facility) to determine compliance with the Clean Air Act.

Table 1 lists the inspection team members.

Table 1 INSPECTION TEAM MEMBERS	
Name, Title	Affiliation
Scott Postma	EPA, Region 7, ECAD, Air Branch

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Dave Francis, Owner	(314) 436-7484	dfrancis9@hotmail.com

FACILITY OVERVIEW

As an area source of HAP's, D&D is not required to have a Title V permit from the Missouri Department of Natural Resources. D&D is subject to the following regulations and standards listed in Table 3. Mr. Francis said that D&D has been in business since 1987.

D&D has no prior enforcement history.

Table 3 lists the regulations and standards

Table 1. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR, Part 63	Subpart A, General Provisions
40 CFR, Part 63	Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

FACILITY OPERATIONS SUMMARY

D&D is an automotive body repair and painting facility. D&D does not do any chemical paint stripping. The facility consists of a semitruck body repair and paint preparation in the southwest portion of the building and a painting section in the north portion of the building. Automotive painting is conducted in their three self-contained booths (i.e. Paint Booth 1, Paint Booth 2, and Paint Booth 3). The paint booths are designed with outlet filters certified to have a collection efficiency that exceeds the requirements (see Appendix 1). The booths have two fans, an inlet and

outlet, to maintain the pressure per the requirements of 40 CFR, Part 63, Subpart HHHHHH. D&D personnel were only repairing vehicles at the time of the inspection. The D&D paint booths fans were not operating during the inspection because no trucks or parts were being painted.

Establishments involved in paint stripping and automotive painting have a Standard Industrial Classification (SIC) number 7532 and a North American Industrial Classification System (NAICS) number 811121. D&D typically operates 8-10 hours per day, five days per week and currently employ 23 people.

FIELD ACTIVITIES SUMMARY

I conducted a drive-by, visual observation of the D&D facility at 1413 Howard Street on January 26, 2022, with no findings. I arrived at the D&D facility 's front entrance at about 1:00 p.m. I entered the facility and was greeted by Steven Francis. Mr. Francis escorted me to his office. I presented my credentials to Mr. Francis and explained the statutory authority and purpose of the inspection. After some initial general discussion of the processes used at D&D and the facility layout, we reviewed the 40 CFR, Part 63, Subpart HHHHHH requirements.

I informed Mr. Francis that a Confidentiality Notice would be provided for him to make a confidential business information claim if necessary (Appendix 2). Mr. Francis was also provided a Receipt for Documents and Samples form (Appendix 3).

Mr. Francis conducted the facility tour. During our tour and our discussions, I completed my Subpart HHHHHH checklist (Appendix 4). I took pictures during the facility tour (see Appendix 5). All photographs were taken on January 26, 2022. Mr. Francis showed me the repair area and the paint booth. Trucks requiring body work are repaired just outside the front office of the building. When the trucks, or their parts, are ready for painting, they are transferred to the paint booth area in the back of the building.

Mr. Francis showed me Paint Booth 1 or the large booth (see Photo 1, Appendix 5), Paint Booth 2 or the small paint booth in the middle (see Photo 2, Appendix 5), and the other large Paint Booth 3 (see Photo 8, Appendix 5).

I requested Mr. Francis provide the paint usage, solvent disposal records, painter training certifications, paint booth specifications, paint gun specifications, filter material specifications and safety data sheets (SDS). These documents were not available on site and were sent to me via email on several occasions. I received painter training certifications, the booth information, filter specification, spray gun specifications, paint usage, and initial notification via e-mail on February 7, 2022 (Appendix 6). I received the repaired pressure gauge pictures via email on February 4, 2022 (Appendix 7). I received the solvent disposal records and SDS while on site (Appendix 1). The SDS indicated that no HAPS were contained in the primer, paint, or clear coat. I also asked Mr. Francis about the facility's methylene chloride usage records. Mr. Francis stated that they do not use any methylene chloride paint stripping materials.

At the conclusion of the inspection, I conducted an exit interview with Mr. Francis. I explained my initial observations. I provided Mr. Francis with a copy of the Confidentiality Notice (Appendix 2) and a Receipt for Documents and Samples (Appendix 3). Mr. Francis signed both forms. No claim of confidentiality was made. I left the facility at about 4 p.m.

AREA/DOCUMENTS INSPECTED/REVIEWED

I reviewed the condition of the paint booths, the operating status, and any required record keeping for the equipment.

Subpart HHHHHH requires facilities to maintain records for the painter training certification, paint gun specifications, and filter material specifications. Mr. Francis provided these records as described above.

Observations are noted in the **Investigation Observation** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Site conditions and activities are documented in the inspection checklist (Appendix 4). The field photographs are attached as Appendix 5. I made the following observations and discussed all observations with Mr. Francis during the closeout meeting. These observations are not final compliance determinations. EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

I did not notice a paint smell upon entering the facility. I did not observe opacity or fumes from the paint booth. I did not notice any painting outside of the paint booth.

I observed that the filters were installed in the paint booths and were functional.

I observed a coating of collected emissions particulate on the paint booth filters (Photograph 8, Appendix 5).

No emissions were observed exiting the roof of the paint booth.

Mr. Francis told me that they do not perform chemical paint stripping.

I observed that D&D had four SATA high volume-low pressure (HVLP) paint guns in use. 40 CFR Part 63, Subpart HHHHHH requires paint gun labeling or certifications. D&D is required to show an HPLV labeling or maintain a copy of the certifications. Mr. Francis said that the paint guns were manufactured by Tekna. Mr. Francis provided copies of the paint gun certifications (Appendix 6). The paint guns were certified as HVLP. The paint guns had the labeling "HPLV" to meet the Subpart HHHHHH requirements.

D&D is required to maintain a copy of the filter efficiency. Mr. Francis provided the filter efficiency document (Pages 1 and 2, Appendix 6). Filter replacement records were being recorded and maintained (Pages 3 to 5, Attachment 6). The filter removal efficiency documentation provided to me was greater than the required minimum of 98 % collection efficiency. However, there was no indication that the filter material specification documentation by LMS Technologies was specific for D&D.

Observation 1: Paint booth pressure gauges
Observation Summary: The three paint booths at D&D did have pressure gauges. However, Paint Booth 1, Paint Booth 2, and Paint Booth 3 were either off scale (well below the maximum pressure 0.00 inches water column) or not operational. The paint booths are required to below the maximum pressure 0.05 inches water column.
Citation: 40 CFR, Part 63, Subpart 6H (63.11173 (e)(2)(ii))

Observation 1: Paint booth pressure gauges
Evidence: Photolog and Photographs (see Photographs 5, 6, 7, and 9 contained in Appendix 5)
<p>Description of Observation: During the facility tour, I observed that the three paint booths fans were not in operation. The booths had installed pressure gauges (see Photographs 5, 6, 7, and 9 contained in Appendix 5) but the gauges did not register any pressure. None of the paint booths had active painting during the time of the inspection.</p> <p>Paint Booth 1 was not operating at the time of the inspection. No measured pressure was registered on the gauge or the was off scale (Photographs 5 and 6). The pressure should have been near 0.0 inches water column. Mr. Francis said that the gauges needed oil and/or calibration. Mr. Francis said that he would repair, calibrate, and monitor the pressure gauges at or below 0.00 inches water column.</p> <p>Paint booth 2 was not operating at the time of the inspection. The pressure gauge did not have an indicated pressure or was not operational (Photograph 7). The pressure should have been near 0.0 inches water column. Mr. Francis said that the gauges needed oil and/or calibration. Mr. Francis said that he would repair, calibrate, and monitor the pressure gauges at or below 0.00 inches water column.</p> <p>Paint booth 3 was operating at the time of the inspection. The pressure gauge did not have and indicated pressure or was not operational (Photograph 9). The pressure should have been near 0.0 inches water column. Mr. Francis said that the gauges needed oil and/or calibration. Mr. Francis said that he would repair, calibrate, and monitor the pressure gauges at or below 0.00 inches water column.</p> <p>Mr. Francis sent pictures in Appendix 7 that shows that two pressure gauges were above 0.00 inches of water column at 0.10 inches water column after the gauges were repaired (See Appendix 7).</p> <p>I did not observe a gauge or automatic pressure adjusting system. Non automated systems are required to keep the pressure below 0.00 inches of water column.</p>
Observation 2: Painter certifications for Subpart HHHHHH training. D&D did not produce the required Subpart HHHHHH training certification for employee Luke Smith. Mr. Smith sprays coatings for D&D.
Observation Summary: The facility's painters are required to take, and retake every 5 years, retain for 5 years, and produce the record of having taken the painter training. A document certifying Bill James, Bill Meyer, and John Lawson was submitted. A training certificate was not provided for Luke Smith.
Citation: 40 CFR, Part 63, Subpart 6H (63.11173 (e)(1))
Evidence: No painter certification provided that was dated prior to the inspection.
<p>Description of Observation: The facility is required to take training, and retake training every 5 years and maintain 5 years of records. Mr. Francis and I reviewed the most recent Subpart HHHHHH training certifications (Appendix 6). Mr. Francis told me that the D&D personnel required to take the training was Bill James and Luke Smith. Mr. Francis provided the Subpart HHHHHH training certifications for Bill James, Bill Meyer, and John Lawson (Appendix 6). No training certification was received for Luke Smith. The certifications were on August 14, 2018, which was within the last five years. The training included classroom and hands-on training (paragraphs (f)(2)(i) through (2)(iv)). A specific list of the items included in</p>

Observation 2: Painter certifications for Subpart HHHHHH training. D&D did not produce the required Subpart HHHHHH training certification for employee Luke Smith. Mr. Smith sprays coatings for D&D.

the training was not provided. The training was completed by the “President of Advantage Paint and Body Supplies”.

Potential Finding 3: Notification of compliance status and annual notification of change report

Observation Summary: The facility did not produce a notification of compliance status or annual notification of change report.

Citation: 40 CFR, Part 63, Subpart HHHHHH (63.11175 (b) and 63.11176 (a))

Evidence: *Appendix 6*

Description of Observation:

D&D is required to submit a copy of the Notification of Compliance status and an annual Notification of Change Report. D&D did not produce any notifications.